

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 10-MJ-10275-DPW
)	
JOSE L. BAEZ)	
)	

JOINT STATUS REPORT

Now comes the United States, by its attorneys, Carmen M. Ortiz, United States Attorney, and David G. Tobin, Assistant U.S. Attorney, and the Defendant, by his attorney, Murat Erkan and hereby files with this Honorable Court a Joint Status Report.

PROPOSED DATES FOR SUPPRESSION HEARING, TRIAL OR RULE 11

The parties propose the following dates for the motion to suppress hearing: November 16, 18, 30 and December 1; and the parties propose that the trial be scheduled for February 2012.

PENDING OR CONTEMPLATED MOTIONS

A motion to suppress evidence is pending. The defense contemplates the additional motions: motion to suppress identifications, motion to dismiss, motion for additional discovery/motion to compel, and a motion pertaining to the defendant's mental health.

POSSIBILITY OF RESOLUTION SHORT OF TRIAL

The parties have not entered into plea negotiations and a trial is anticipated.

INTERPRETER

The defendant requires a Spanish language interpreter.

CUSTODY

The defendant is in federal pretrial custody.

FUGITIVE

The defendant is not a fugitive.

OTHER MATTERS

The parties have no additional matters to bring before the court at this time.

Respectfully submitted,

Carmen M. Ortiz
United States Attorney

By: /s/ David G. Tobin
DAVID G. TOBIN
Assistant U.S. Attorney

JOSE L. BAEZ
Defendant

By: /s/ Murat Erkan
MURAT ERKAN

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ David G. Tobin
DAVID G. TOBIN
Assistant United States Attorney

Date: October 12, 2011